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AMAX
Minerals+Energy

December 5, 1988

Ms. Alice C. Fuerst
Cherokee County Remedial
Project Manager
Superfund Branch
Waste Management Division
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Ground and Surface Water Operable Unit
Galena Subsite, Cherokee County, Kansas

Dear Ms. Fuerst:

Enclosed please find two copies of each of three reports for your review. These reports are:

1. Results and Analysis of Leaching Tests, Adrian Brown Consultants, Inc., December 5, 1988
2. Field Estimate of Available Disposal Space for Surface Mine Wastes at Galena, Kansas, Gary Andes, November 19, 1988
3. Summary of PRP Additional Alternative and Comparison to the EPA Criteria, Adrian Brown Consultants, Inc., December 5, 1988

The first report presents the results of the leaching tests carried out at Core Laboratories under the direction of Adrian Brown Consultants in response to the EPA test protocols sent to us in late August 1988.

The second report consists of a field evaluation of available void space in the Galena area, including observations of water levels in the various pits and subsidence features. Note that actual depth measurements were taken in the larger water-filled features.

The third report, drawing on the first two, was prepared in response to your request to compare the PRP's suggested remedial action alternative (which we have designated the "Additional Alternative" in recognition of the fact that EPA has examined many alternatives) to the nine criteria used by EPA to evaluate alternatives.



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The PRPs note that the Additional Alternative, i.e., relocation of mine wastes into accessible void space, is suggested as a replacement for the mine waste milling portion of the EPA-preferred alternative, but by its nature would essentially encompass the recontouring portion of the EPA alternative also.

Once again, the PRPs wish to state for the record that they believe the proper remedial action for the ground water and surface water operable unit for the Galena sub-site is the no-action alternative. However, the PRPs also believe that the information presented by the reports submitted today establishes that the Additional Alternative is equally if not more protective of human health and the environment as well as being more reliable and cost-effective than the milling alternative.

The PRPs also state that in submitting these reports, they are making no admission or waiver of any defense (nor should the reports be considered or construed as an admission or waiver) concerning their potential responsibility or liability for cleanup activities or response costs at the Cherokee County site, or concerning the propriety of the U.S. Environmental Protection Agency's activities there.

Sincerely,



Kenneth R. Paulsen
on behalf of AMAX Inc.,
Gold Fields, NL Industries,
St. Joe Minerals

KRP:nc

Enclosures

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REMD SECTION

